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April 18, 2017

## **VIA ECF AND E-MAIL**

The Honorable John J. Thomas
United States Bankruptcy Judge
U.S. Bankruptcy Court, Middle District of Pennsylvania
150 Max Rosenn U.S. Courthouse
197 South Main Street
Wilkes-Barre, PA 18701

Re: In re: Salvatore J. Catalano and Susan E. Catalano

No. 5:14-bk-04282-JJT

Dear Judge Thomas:

We represent creditor CXA-16 Corporation ("CXA"), successor to LNV Corporation, with respect to the above-referenced matter. We ask that Your Honor accept this letter in lieu of a more formal objection to Debtors' Seventh Amended Plan [ECF doc. 192].

As the Court and Debtors are aware, CXA is the holder of an unsecured deficiency claim following foreclosure on Debtors' property in Portland, Pennsylvania, and has filed an appropriate Amended Proof of Claim [Claim 10] as to the deficiency claim in the amount of \$394,903.56. However, CXA is not listed as an unsecured creditor in Debtors' Seventh Amended Plan. Accordingly, we write to request that CXA be treated as and paid as a general unsecured creditor in the event that Your Honor confirms Debtors' Seventh Amended Plan.

We thank Your Honor for your consideration.

Respectfully yours,

Richard A. O'Hallorau

Richard A. O'Halloran

RAO/lmh

cc: All Counsel of Record (via ECF notification)